

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

**DAWN BISHOP MCLIN, Ph.D.**

*Plaintiff,*

**-vs.-**

**Case No. 3:25-cv-193-HTW-ASH**

**JACKSON STATE UNIVERSITY,  
THE MISSISSIPPI BOARD OF TRUSTEES OF  
STATE INSTITUTIONS OF HIGHER  
LEARNING, and MARCUS L. THOMPSON, Ph.D.**

*Defendants.*

**DAWN BISHOP MCLIN, Ph.D.’s RESPONSE IN OPPOSITION TO  
DEFENDANT MARCUS THOMPSON’S MOTION TO DISMISS**

Plaintiff Dawn Bishop McLin, Ph.D. (“Dr. McLin”), through counsel, hereby files her Response in Opposition to Defendant Marcus Thompson’s (“Dr. Thompson”) Motion to Dismiss [ECF No. 5 & 6]. In support, Dr. McLin states and argues as follows:

1. Dr. Thompson is not entitled to qualified immunity on either of Dr. McLin’s constitutional claims, and his motion to dismiss on these grounds should be denied.
2. Dr. Thompson’s motion to dismiss on qualified immunity grounds should be summarily denied with respect to Dr. McLin’s state-law claims.
3. Dr. Thompson’s remaining arguments should likewise be rejected, and his motion to dismiss should be denied, because Dr. McLin’s claims are well pleaded.
4. For these reasons, and for the reasons set forth in Dr. McLin’s Memorandum in Support of her Response in Opposition to Defendant Marcus Thompson’s Motion to Dismiss, Dr. McLin respectfully requests this Court deny Defendant Marcus Thompson’s Motion to Dismiss [ECF No. 5 & 6].

THIS, the 23<sup>rd</sup> day of May, 2025.

Respectfully submitted,

**DAWN BISHOP McLIN, PH.D.**

By: /s/ Chadwick M. Welch  
Chadwick M. Welch (MSB No. 105588)

*Her attorney*

OF COUNSEL:

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**CERTIFICATE OF SERVICE**

I, Chadwick M. Welch, hereby certify that on this day I served the foregoing pleading which will be served upon all counsel of record via the Court's electronic filing system.

THIS, the 23<sup>rd</sup> day of May, 2025.

/s/ Chadwick M. Welch  
Chadwick M. Welch